

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMIT PATEL,

Plaintiff,

v.

CON-WAY FREIGHT, INC. and
RONALD K. BORDEN,

Defendants.

C.A. NO. 1:14-cv-13070-MLW

JOINT MOTION TO EXTEND DEADLINE SET FORTH IN
SETTLEMENT ORDER OF DISMISSAL

NOW COME the parties to the above-captioned action and respectfully request that the Court extend the deadline set forth in the Settlement Order of Dismissal by approximately 30 days to February 23, 2017. In support of this Motion, the parties state that they have been working cooperatively to finalize the settlement in this matter, which has included addressing a medical provider lien and negotiation of the terms of a release. Last week Plaintiff executed the release, which has now been provided to Defendants' counsel. The parties have agreed to file a stipulation of dismissal with prejudice in this matter once the settlement proceeds are disbursed. As a result, the parties require a short extension of the deadline set forth in the Settlement Order of Dismissal in order to finalize the settlement, disburse the settlement proceeds, and file this stipulation of dismissal with prejudice. For these reasons, good cause exists to grant this motion.

WHEREFORE, the parties respectfully request that the Court the deadline set forth in the Settlement Order of Dismissal by approximately 30 days to February 23, 2017.

Respectfully submitted,
Plaintiff,
Amit Patel,
By His Attorneys,

/s/ Peter Heppner

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Respectfully submitted,
Defendants,
Con-Way Freight, Inc. and
Ronald K. Borden,
By Their Attorneys,

/s/ Alan E. Brown

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Alan E. Brown, BBO #665203
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 18, 2017.

/s/ Alan E. Brown

Alan E. Brown